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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHENGJIE LI,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,

Defendant.

Case No. 3:24-cv-07508 TSH

**SECOND STIPULATION TO EXTEND TIME
FOR DEFENDANT'S RESPONSE TO
PLAINTIFF'S COMPLAINT; AND
[PROPOSED] ORDER**

On January 3, 2025, the Court granted the parties' first stipulation to extend time for Defendant's response to Plaintiff's complaint. *See* Dkt. 12. The parties, through their undersigned attorneys, hereby stipulate to an additional extension of time for Defendant's response to Plaintiff's complaint. Defendant will file their response on or before March 5, 2025. The parties make this request because Defendant needs a brief period of additional time to confer and prepare their response. In view of the agreed-upon extension for Defendant's response to the complaint, the parties request that, Defendant must file their motion for summary judgment by May 5, 2025.

1 Dated: February 3, 2025

Respectfully submitted,¹

2 ISMAIL J. RAMSEY
3 United States Attorney

4 /s/ Elizabeth D. Kurlan
5 ELIZABETH D. KURLAN
6 Assistant United States Attorney
7 Attorneys for Defendant

8 Dated: February 3, 2025

9 /s/ Kristina David
10 KRISTINA DAVID
11 David Strashnoy Law, PC
12 Attorney for Plaintiff

13 **~~PROPOSED~~ ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED.

15 Date: February 4, 2025

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17 THOMAS S. HIXSON
18 United States Magistrate Judge
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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendant in the above-captioned action.

2. On January 3, 2025, the Court granted the parties' first stipulation to extend time for Defendant's response to Plaintiff's complaint. *See* Dkt. No. 12.

3. I have been conferring with Plaintiff's counsel and we determined that a brief period of additional time is necessary for me to discuss this case with the agency and prepare Defendant's response to the complaint.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: February 3, 2025

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN

Assistant United States Attorney